

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS
ANTITRUST LITIGATION

:
: Master File No. 12-md-02311
:
: Case No. 12-cv-00602

PRODUCT(S):

OCCUPANT SAFETY RESTRAINT
SYSTEMS

:
:
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:
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This Document Relates to:

ALL DEALERSHIP ACTIONS

:
: Hon. Marianne O. Battani
:
:

**Dealership Plaintiffs' Motion For Preliminary Approval Of Proposed
Settlement With Defendants Autoliv, Inc., Autoliv ASP, Inc.,
Autoliv B.V. & Co. KG, Autoliv Safety Technology, Inc. And Autoliv
Japan Ltd. And Provisional Certification Of A Settlement Class**

Dealership Plaintiffs hereby move the Court, pursuant to Rule 23(c) and (e) of the Federal Rules of Civil Procedure, for an Order in the form attached hereto:

(1) Preliminarily approving the proposed settlement of this litigation with Defendants Autoliv, Inc., Autoliv ASP, Inc., Autoliv B.V. & Co. KG, Autoliv Safety Technology, Inc., and Autoliv Japan Ltd. (collectively "Autoliv");

(2) Provisionally approving the proposed Settlement Class;

(3) Staying the proceedings against Autoliv in accordance with the terms of the Settlement Agreement;

(4) Authorizing Interim Co-Lead Class Counsel for Dealership Plaintiffs to provide notice of the Settlement Agreement to Settlement Class members, at a later date, in a form and manner to be approved in advance by this Court; and

(5) Appointing Interim Co-Lead Class Counsel for Dealership Plaintiffs as Settlement Class Counsel for purposes of this settlement.

In support of this Motion, Dealership Plaintiffs rely upon and incorporate by reference herein the facts and legal arguments set forth in the accompanying Memorandum of Law.

Autoliv consents to this motion and to the entry of the proposed order.

Dated: June 13, 2014

Respectfully submitted,

/s/Gerard V. Mantese

Gerard V. Mantese
(Michigan Bar No. P34424)
Brendan Frey
(Michigan Bar No. P70893)
David Hansma
(Michigan Bar No. P71056)
**ManteseHonigmanRossman
and Williamson, P.C.**
1361 E. Big Beaver Road
Troy, Michigan 48083
Telephone: (248) 457-9200
gmantese@manteselaw.com
bfrey@manteselaw.com
dhansma@manteselaw.com

***Interim Liaison Counsel for Dealership
Plaintiffs and Proposed Settlement Class
Liaison Counsel***

Jonathan W. Cuneo
Joel Davidow
Daniel Cohen
Victoria Romanenko
Cuneo Gilbert & LaDuca, LLP
507 C Street, N.E.
Washington, DC 20002
Telephone: (202) 789-3960
jonc@cuneolaw.com
joel@cuneolaw.com
danielc@cuneolaw.com
vicky@cuneolaw.com

Don Barrett
David McMullan
Brian Herrington
BARRETT LAW GROUP, P.A.
P.O. Box 927
404 Court Square
Lexington, MS 39095
Telephone: (662) 834-2488
Facsimile: (662) 834-2628
dbarrett@barrettlawgroup.com
bherrington@barrettlawgroup.com
dmcmullan@barrettlawgroup.com

Shawn M. Raiter
LARSON KING, LLP
2800 Wells Fargo Place
30 East Seventh Street
St. Paul, MN 55101
Telephone: (651) 312-6500
Facsimile: (651) 312-6618
sraiter@larsonking.com

***Interim Co-Lead Class Counsel for
Dealership Plaintiffs and Proposed
Settlement Class Counsel***

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